IN THE UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF GEORGIA

In re: * CHAPTER 13

*

LESLIE McDANIEL, * CASE NO. 12-41231-JTL

*

Debtor, * JUDGE LANEY

LESLIE McDANIEL, Individually and as Representative of her Bankruptcy Estate,

*

Plaintiff, * ADVERSARY PROCEEDING

vs. * NO. 13-04013

*

SUNTRUST BANK, SUNTRUST

MORTGAGE, INC., McCALLA

RAYMER, LLC, FOXFIRE ACRES, INC.,

**

THE UNITED STATES by and through the THE INTERNAL REVENUE SERVICE, *

THE STATE OF GEORGIA (Represented * by the DEPARTMENT OF REVENUE), THE * GROGAN GROUP, LLC d/b/a GROGAN & *

GROGAN, and THE COLUMBUS

CONSOLIDATED GOVERNMENT,

*

Defendants. *

STIPULATION EXTENDING TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

COMES NOW Leslie McDaniel, Individually and as Representative of her Bankruptcy Estate, by and through her undersigned counsel, and Defendant Foxfire Acres, Inc., by and through its respective counsel, all who stipulate that the time within which Foxfire Acres, Inc. may answer, file defenses and responsive pleadings or otherwise file motions in response to Plaintiff's Complaint is hereby extended through and including December 5, 2013 and that said claims as to this Defendant shall not be in default prior to December 6, 2013. In consideration therefore, Foxfire Acres, Inc. does hereby waive any defenses it may have related to issuance of

process of service of process but specifically reserves any and all other defenses it may have not or hereafter.

This 20th day of November, 2013.

/s/ Fife M. Whiteside

FIFE M. WHITESIDE Attorney for Debtor/Plaintiff GA Bar No. 756025

P.O. Box 5383 Columbus, GA 31906 706-320-1215

/s/ James D. Patrick, Jr. by FMW w/permission

JAMES D. PATRICK, JR. Attorney for Foxfire Acres, Inc. GA Bar No. 566150

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